

August 23, 2011

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

NOTICE OF EX PARTE COMMUNICATION

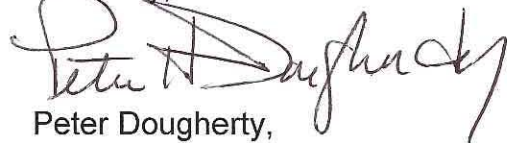
Dear Ms. Dortch:

On Friday, August 19, 2011, Stacy Vasquez and Carolyn Quick Tillery from the Department of Veteran Affairs, Homeless Veterans Initiative Office met with Robert Finley with Wireline Competition Bureau to discuss the Lifeline Program and eligibility criteria as related to providing Lifeline telephone services to homeless Veterans. During this meeting a request for (1) automatic eligibility of homeless Veterans and (2) an exception to the 1 telephone per residential address were discussed.

Consistent with the Program's intent to remove communication barriers to 911 emergency services and economic opportunity, the Department of Veterans Affairs seeks the addition of homeless Veterans to the list of those considered automatically eligible for program enrollment. In addition, the Department seeks an exception to the one telephone per residence rule for sheltered individuals because it is a barrier to those whose deteriorated financial condition requires that they shelter with similarly situated but unrelated persons also requiring Lifeline telephone services.

Included as an attachment to this filing is additional information supporting this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Dougherty", written over a horizontal line.

Peter Dougherty,
Assistant Executive Director,
Homeless Veterans Initiative Office,
Department of Veteran Affairs,

Attachment: Memo in Support of Request

From: Department of Veteran Affairs, Homeless Veterans Initiative Office

RE: Request for Linceline Telephone Services to Sheltered and Other Homeless Veterans

To: Federal Communications Commission

The Need

An estimated 76, 000 Veterans were homeless on any given night in 2009, this according to A Supplemental Report to the Annual Homeless Assessment Report (AHAR) to Congress, published in January 2011. And an estimated 136,000 were homeless over the course of a year. Of that number, the VA reports 11,634 as Operation Enduring Freedom (OEF), Operation Iraqi Freedom (OIF) and Operation New Dawn (OND) Veterans who are homeless or at risk of homelessness, due to health care issues, poverty, unemployment, social isolation, and precarious living conditions (AHAR Supplemental Report, 2009).

Recognizing homelessness amongst Veterans as a growing trend and demonstrating its continuing commitment to Veterans and Veteran families, the Department of Veteran Affairs implemented a Five-Year Plan to prevent and eliminate Veteran homelessness by 2015. The Plan prevents Veterans and their families from entering the cycle of homelessness and also assists those who are homeless to exit as safely and quickly as possible by providing permanent supportive housing, mental health and substance abuse treatment, education and employment assistance. Readily available telephone communications that access Veterans and Veteran families to services, programs, employment, other economic opportunities and emergency services, is essential to preventing and eliminating homelessness for those currently experiencing homelessness as well as those considered at risk.

Risk factors for homelessness

Research suggests that the risk of Veteran homelessness may be related to factors as diverse as age, race, psychiatric illness, and economic status prior to entry in the military (AHAR Supplemental Report, 2009). In addition, unemployment, poor health, and having an anxiety disorder or PTSD have all been associated with homelessness (AHAR Supplemental Report, 2009).

Physical and mental health disorders

Looking at cumulative data from the first quarter of fiscal year 2002 through the second quarter of fiscal year 2011, the most common disorders experienced by all OEF/OIF/OND were:

- Diseases of Musculoskeletal System/Connective System: 55.2%;
- Mental disorders: 51.2%;
- Signs and symptoms undefined: 49.9%;
- Diseases of the nervous system: 43.1%; and
- Diseases of the digestive system: 35.4%).

PTSD, rated number eight, is more difficult to capture because the numbers do not include individuals seen by VA's Vet Centers or data from Veterans who are not enrolled in the VA health care system. Also, the data does not include Veterans who did not receive a diagnosis of PTSD, but instead had a diagnosis of Adjustment Reaction.

Other disease categories associated with OEF/OIF/OND

Disease Category	Total OEF/OIF/OND
PTSD	187,133
Depressive Disorders	139,119
Neurotic Disorders	118,591
Affective Psychoses	83,575
Alcohol Dependence Syndrome	38,749

Mental health disorders—to include PTSD and other behavioral disorders—are often associated with the risk of homelessness. For instance, 40 - 50 percent of homeless Veterans experience some form of mental illness and/or substance use (Department of Veteran Affairs, July 2011).

Poverty

Poverty, as defined by income (and therefore related to employment), also presents a risk factor for homelessness. Ten percent of Veterans living in poverty became homeless at some point during the year, compared to five percent of non-Veterans living in poverty. Young Veterans (ages 18 – 30) living in poverty are nearly three times more likely to be homeless than non-Veteran adults living in poverty (AHAR Supplemental Report, 2009). About one in four Hispanic and African-American Veterans living in poverty become homeless. In 2009, just fewer than ten percent of Veterans in poverty spent at least one night in an emergency shelter or a transitional

housing program. This is roughly double the rate of homelessness for all adults in poverty, which was 5.5 percent in 2009. Given the risk, who *are* the Veterans experiencing homelessness?

The Unemployed

The nation's Veteran unemployment rate has been on a steady incline since 2001, particularly among males in the 18-24 year-old age group. (Department of Veteran Affairs, 2010)

Per Bureau of Labor Statistics (BLS) figures, the 2010 overall unemployment rate for Gulf War-era II Veterans (serving in the military at any time since September 2001) was 11.5 percent. During this same period, the unemployment rate among young males in the 18-24 year old age group was 21.9 percent (Department of Veteran Affairs, October 2011). In June 2011, the overall rate rose to 13.3 percent and saw over 260,000 combat Veterans unemployed and struggling in a slow economy. Continuing to be hardest hit were male Veterans between the ages of 18 and 24, who had an unemployment rate of 19.8 percent (Bureau of Labor Statistics, Unpublished Report, July 2011: *numbers subject to change*). The significance of the unemployment rate among the 18-24 year-old age group is that they are three times more likely to become homeless as a result of poverty. Unemployment creates poverty that places Veterans at risk of homelessness, including those not otherwise at risk. As a result, telephone service is essential to the Veterans ability to make and keep medical appointments, seek employment and schedule interviews, request emergency services and avoid the isolation that places them at increased risk for homelessness

Gender

Ninety-four percent of those experiencing homelessness are men. Although fewer in number than their male counterparts, Veteran women are twice as likely to be in the homeless population as their counterparts in the U.S. adult female population. They are almost three (2.7) times more likely to be in the homeless population when compared to the general population of females in poverty. In addition, females Veterans are also more likely to be homeless when compared to female non-Veterans in the U.S. (AHAR Supplemental Report, 2009). Female, Veterans the fastest growing segment of the homeless Veteran population are represented at six percent.

Ethnicity

Minority, women, and unemployed Veterans are also at risk as indicated by their over-representation in the homeless population, emerging Veteran unemployment and other trends.

The typical Veteran experiencing homelessness is a 51-year-old single male, who is unemployed, and has an income of less than \$125 per week. He is equally likely to be African-American or Caucasian, have served in the post-Vietnam era (1975-1990), and to be living outdoors or in transitional housing (AHAR Supplemental Report, 2009).

Request for Automatic Eligibility

Currently, if a state uses the federal categories, those standards require either that consumers have a total household income that does not exceed 135% of the Federal Poverty Guidelines OR that they participate in one of the following federal programs:

- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Low-Income Home Energy Assistance Program (LIHEAP)
- Temporary Assistance to Needy Families (TANF) or
- The National School Lunch Programs Free Lunch Program

In general, homeless Veterans, with an average income of less than 125.00 per week and participating in homeless programs administered by a federal agency, meet both requirements and for this reason we request that the Department of Veterans Affairs Homeless Veterans Program be added to the eligibility list.

Lifeline Telephone Services: Benefits and Barriers

Lifeline Telephone services will allow the Department of Veteran Affairs and its community partners to expand outreach access and coordinate essential services for Veterans and Veteran families. It will assist in overcoming many of the Veteran unique barriers to preventing and eliminating Veteran homelessness such as receiving appropriate healthcare and surmounting the disproportionately high unemployment rate among Veterans in a very competitive, economy driven job market. In addition, such services provide more ready access to other supportive services, as well as preventive and emergency services. In addition, it permits case workers to provide more frequent

contact with this most vulnerable population and therefore, eliminate the isolation that places them at increased risk for homelessness. Unfortunately, the requirement for one telephone per residential address is a barrier to Veterans in our transitional housing program, in which multiple, unrelated Veterans share one common address and have no self-identifying unit number within that address, i.e. apartment number.

Request for Exception to the Rule and Recommendation:

The one telephone per residence rule is designed to prevent overlap and abuse, particularly within a family setting. Ninety-four percent of homeless Veterans are single males. Therefore, although they may share a residential address, they are very likely unrelated. In addition, multiple person grant and per diem housing offers independent, third party validation not available when mailing the telephone to a private residence with multiple family members.

The Grant and Per Diem (GPD) Program funds community-based agencies providing transitional housing or service centers for up to 250 homeless Veterans for as long as two years. Supportive services are also provided by trained staff members. As part of the supportive service process, these staff members can assist with the application process and validate the service request. As a result, more safeguards are available to prevent the type of abuse and overlap the rule was designed to eliminate.

Alternatively, recommend using the Veterans state abbreviation and last four of their unique driver's license, state identification (e.g. AL1234) or tax ID number to identify them as a unique within the shelter environment. In a shelter environment, which is more akin to an apartment building without apartment identification numbers, this number would serve the same purpose as an apartment number by uniquely identifying each addressee within the single shelter address.

Homeless Veterans are among the most vulnerable members of society and the group most intended to be assisted by ready access to life line communications such as those offered by Lifeline. For this and the reasons set forth above, this request for exception should be favorably reviewed and granted.